

**From:** Marc Shargel [mailto:mlpa@livingseaimages.com]  
**Sent:** Saturday, October 15, 2005 8:36 PM  
**To:** MLPAcomments@resources.ca.gov  
**Cc:** John Wolfe; yscuba@californiadivers.com  
**Subject:** Comment on Evaluation Matrix for Existing MPAs

Dear I-Team Staff,

Thanks for soliciting additional comment on the revised "Evaluation of Central Coast MPAs." Thanks also for your work on the document and for reviewing these thoughts. As we've wrestled to organize the data related to several specific MPA proposals we've gained a greater appreciation for the huge task represented in this evaluation matrix. Thanks for taking it on and doing it so thoroughly.

We have several comments, which we hope will contribute to improving the quality of the document. We want to emphasize that these suggestions are an attempt to augment the work done to date, and not to criticize it. Given that several specific suggestions follow, we want to direct extra attention to our suggestions for evaluation of **Goal 3, Objective 1, and Goal 5, Objective 2.**

We'd appreciate further specifics on Design Consideration #10. We currently understand that there is an order of preference (from best to worst) regarding enforceable boundaries:

1. Easily recognized straight line visual line-ups (buoys, landmarks) that are well-documented on navigation charts.
2. Orthogonal straight east-west and north-south boundaries, to lat/longs to the closest tenth of a minute.
3. Diagonal straight lines between lat/long corner points, to the closest tenth of a minute.
4. Depth contours.

Can you please confirm or correct this understanding? We also understand that this is a list of preferences. We believe that if diverse stakeholders can agree on an MPA, but only by drawing its boundaries with types low on this list, DFG will continue to support the RSG process and its conclusions. Could you please comment on that belief?

The data indicating amount of each habitat type in a given MPA is wonderful, as is the report of presence or absence of a given feature. In the wake of the SAT's recent discussion about "nursery" areas, we believe that reports of juvenile forms within the evaluated MPAs should also be listed. (See our comment below on the *use of this information in evaluating Goal 5, Objective 2.*) Also, we find some minor inconsistencies in the data itself: Hopkins SMR is reported as an upwelling cell, while adjacent PG SMR is reported as not being one. There is some unresolved discussion about whether these same areas include a retention zone.

We believe the data reported in the evaluation matrix for **Goal 1, Objective 3** is in great need of review and accuracy. we can personally attest to observations of many of the "species of interest" in the PG SMCA and Carmel Bay SMCA. We recognize that cataloging this list against each MPA is a substantial piece of work. That said, we are concerned that the initial review "cherry picks" just thirteen of the hundreds (thousands?) of species present on the Central Coast and gives a distorted view of the value of a given MPA. Preservation and/or recovery of those thirteen species alone are **not** the rationale for MLPA. It is the benefit of **all** species that we seek. A far better metric would be the total number of species present in an MPA (its diversity). Of course that is impossible. It seems the list of "Species of Interest" at the end of the document is an attempt to reach a happy medium: a manageable number of species and types, reasonably representative of diversity. We hope the secondary review will be based on this list. Such a review would be a far better proxy for evaluation of this objective.

The revised criterion for **Goal 1, Objectives 4 & 5** ("Is the area no take?") accurately reflects the protection of food webs and we applaud that selection. We appreciate that Shargel's comment on the previous version was accepted.

Our second comment on Goal 1, Objective 3 (about "cherry picking" too small a number of species) applies equally to **Goal 2, Objective 2**. This Objective seems to refer explicitly to the list of "species likely to benefit." Evaluation (at least this initial one) based on the list of just 13 key species seems an inappropriately narrow proxy. The list is heavily tilted to fin fish, and contains just one genus of invertebrates. The notes in the document suggest an intent to expand this evaluation to the attached list of "species likely to benefit." We applaud that intent and encourage your follow through.

For **Goal 2, Objective 3**, it might be more informative to evaluate whether take of highly migratory species is permitted, since the Objective does not specify the "selected species" it seeks to protect.

The evaluation of **Goal 3, Objective 1**, exclusively by distance to towns and whether adjacent to an institution, misses a key point of the objective. First of all, if some aspect of this objective is to be evaluated quantitatively (which we applaud), all aspects should be quantified. We encourage that effort: distance to research institutions should be measured. So should non-consumptive use. To paraphrase Shargel's earlier comment, the current metrics are appropriate, but incomplete. To fully evaluate this objective, "traditional non-consumptive use" must be considered, too. Several metrics or approximations can be devised. To quote Shargel's earlier comment:

The simplest is: "Does the MPA include (a) traditional non-consumptive use area(s)?" Ideally we'd be able to measure the proportion of non-consumptive uses (diving, kayaking, surfing, wildlife viewing, etc) that take place there. Given the much-discussed lack of hard data in this area, the best available information is probably obtained by starting with mapped use pattern information. However, I urge you to be SURE to reality-check that data by confirming it with the relevant expert(s) on those usages on the RSG.

To amplify, if we knew the total non-consumptive use, and the site by site use, we could easily find the fraction of non-consumptive use taking place at each site. An MPA containing a large fraction traditional use meets this objective better than one which contains a small fraction. As we don't have the necessary data (a much lamented data gap) we must use a proxy. We recommend the one mentioned above.

As it stands, the current means of evaluation could give high scores to an area fronting a town, *but in which **no non-consumptive use*** has traditionally taken place, yet give lower scores to, say, Point Lobos, which sits a small distance from towns, yet is an extremely popular and highly valued non-consumptive use area. This result would simply be inaccurate, and distort reality.

It is difficult to comment on **Goal 3, Objective 4** as the text is not fully shown.

**Goal 5, Objective 2** measures only the size (span) of the MPA and the spacing to the next. This so grossly oversimplifies the SAT advice, we believe, that it fails to properly evaluate the objective. The MLPA itself mandates protection of each habitat type within marine **reserves**. The SAT has told us how to size and space those areas in order to do that. To evaluate this objective we must ask whether an MPA is no take, and evaluate the spacing **to the next reserve containing similar habitats**. The current analysis leads us to conclude that the gaps are far, far less than they probably are in fact. A functional analysis would list the habitat types protected by the MPA, distance to the next MPA containing each of those habitats, **and the next reserve** containing each of those habitats. Without those measures, we believe that the "use of the scientific guidelines" cannot be assessed. As the SAT advice is intended to provide biological connectivity between reserves containing specific habitat types, and this is the only

objective that directly addresses that critical principle, we stress the need for having this information to assess.

Additional important considerations are whether the MPA extends into deep water and how many habitats (representative and unique) it includes. As currently written, an MPA protecting just the beach is evaluated as highly as an MPA with equal span, but extending to the 3-mile state limit!

In closing, we want to re-iterate our appreciation for the huge effort that has gone into this document. While our comments above dwell primarily on what should, in our opinion, be improved, we hope they do not overshadow our admiration of the overall document. We further hope our comments will be useful and taken in the constructive mood in which they're offered.

Sincerely,

John Wolfe,  
Jesus Ruiz,  
Marc Shargel

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Marc Shargel,  
Sea Life Photographer  
Chair, The Coalition of Organizations for Ocean Life  
Alternate Member, MLPA Central Coast Regional Stakeholder Group

I've created this email address specifically to accept correspondence on marine reserves, MLPA, and related issues. Please send comments and questions to:  
**[MLPA@LivingSeaimages.com](mailto:MLPA@LivingSeaimages.com)**

For more information on the creation of marine reserves along the Central Coast, see: <http://www.CaliforniaMarineReserves.org>